

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No.
	)	
v.	)	
	)	MAGISTRATE GENERAL
ANDREW G. KROL a/k/a ANDY G. KROL,	)	
	)	
Defendant.	)	

COMPLAINT

The United States, by Gary S. Shapiro, Acting United States Attorney for the Northern District of Illinois, brings this action against the defendant, ANDREW G. KROL a/k/a ANDY G. KROL, and for its cause of action states:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1345 and 7 U.S.C. § 2021(f).
2. The defendant, ANDREW G. KROL a/k/a ANDY G. KROL, resides within the jurisdiction of the court.
3. Pursuant to the provisions of Title IV-B of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1071 - 1087-2, and regulations promulgated thereunder 34 C.F.R. Part 682, the defendant executed promissory notes as more fully set forth in the Certificate of Indebtedness attached hereto as Exhibits "A" and "B", respectively.
4. Although demand has been made for payment, there remains due and owing the principal sum of \$711.98, plus interest to August 22, 2012, in the sum of \$1,229.73 at 8.000% per annum.

WHEREFORE, the United States demands judgment against the defendant as follows:

- a. in the amount of \$1,941.71 (\$711.98 principal and \$1,229.73 interest accrued through August 22, 2012);
- b. interest to continue to accrue at the rate of 8.000% per annum until the date of Judgment;
- c. costs of suit; including but not limited to, filing fee of \$150.00, as authorized by 28 U.S.C. §2412(a)(2), and
- d. for such other proper relief as this court may deem just.

Respectfully submitted,

GARY S SHAPIRO  
Acting United States Attorney

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